

# UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

09-M-0299

JOSEPH SANTIAGO (dob: 8/24/88)

CASE NUMBER:

I, R. Travis Homer, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**Count One;** On or about December 14, 2009, in Milwaukee County, in the State and Eastern District of Wisconsin, JOSEPH SANTIAGO did knowingly take by intimidation from the presence of a teller money which was in the possession of M&I Bank, Milwaukee, Wisconsin, the deposits of which were insured by the Federal Deposit Insurance Corporation and in so doing, the defendant put a tellers life in jeopardy by the use of a dangerous weapon in the form of a firearm, in violation of Title 18, United States Code, Sections 2113(a) and (d), and **Count Two:** On or about December 14, 2009, in Milwaukee County, in the State and Eastern District of Wisconsin, JOSEPH SANTIAGO knowingly used, carried, and brandished a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, armed bank robbery as charged in count one of this complaint, and did possess the firearm in furtherance such crime, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

I further state that I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and this complaint is based on the following facts:

Please see the attached affidavit of Special Agent R. Travis Homer.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

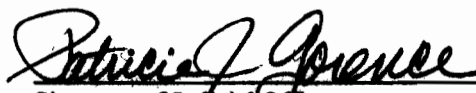
  
Signature of Complainant: R. Travis Homer

Sworn to before me and subscribed in my presence,

December 18<sup>th</sup>, 2008  
Date

at Milwaukee, Wisconsin  
City and State

The Honorable Patricia J. Gorence  
United States Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

R. Travis Homer, being first duly sworn under oath, on information and belief says that:

1. I am employed as a Special Agent by the Federal Bureau of Investigation and have been so employed for approximately one year and a half. Prior to joining the Federal Bureau of Investigation, I was a sworn law enforcement officer in the State of Utah for eight years.
2. I am the lead agent in the investigation of an armed bank robbery that occurred at approximately 12:34 p.m., on December 14, 2009, at the M&I Bank located at 414 W. National Avenue, Milwaukee, State and Eastern District of Wisconsin. At the time of the robbery, the deposits of this bank were insured by the Federal Deposit Insurance Corporation.
3. This affidavit is based on my personal knowledge, information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon information gained from interviews with citizen witnesses and defendants.
4. Citizen Witness S.M. reported that she is employed by the above described M&I Bank. S.M. stated that at the time of this robbery, she was working as a bank teller. S.M. stated that a lone male entered the bank. S.M. advised the male was completely masked and was armed with a black and silver handgun, which the male waved at everyone inside the bank. S.M. stated that the robber was a Hispanic male, early to mid 20s, wearing a black knit cap, a black and white bandana, a black knit sweater and black knit gloves. The robber yelled something to the effect of, "nobody move! This isn't a game." The robber placed a black nylon bag on the teller counter and demanded S.M. to fill it. S.M. placed money into the black nylon bag from her top teller drawer. S.M. was then instructed by the robber to pass the bag down to her co-worker, which S.M. did. S.M. stated money was placed into the black nylon bag by the second teller and then passed to a third teller. S.M. reported the third teller also filled the black nylon bag with money. S.M. stated the third teller placed the bag onto the counter and the robber retrieved the bag. The robber then fled the bank on foot.
5. Citizen Witness I.P. reported that he is employed by the above described M&I bank. I.P. said at the time of the robbery, he was working as a bank teller. I.P. reported a male, who was masked and armed with a handgun came into the bank. I.P. stated that the robber was a Hispanic male, early to mid 20s, wearing a black knit cap, a black and white bandana, a black sweater or jacket and black gloves. The robber was fanning the gun at the tellers and customers. The robber placed a black nylon bag onto the teller counter next to S.M. I.P. saw S.M. put money into the black nylon bag from S.M.'s top teller drawer. S.M. then passed the bag to I.P. I.P. advised he placed money into the black nylon bag from his top teller drawer and from monies that was previously placed on the counter. I.P. stated he then passed the black nylon bag to a third teller, A.R., who was

also working as a bank teller. I.P. stated A.R. placed money into the black nylon bag from her cash drawer, after which the robber took the bag. The robber then turned and fled the bank.

6. Citizen Witness A.R. reported she is employed by the M&I Bank. A.R., at the time of the robbery, was working as a bank teller. A.R. was helping a customer inside the bank when A.R. heard someone yell, "Put your hands in the air." A.R. saw a male individual with a gun in his hand, waving the gun back and forth toward customers in the lobby. A.R. stated that the robber was a male, wearing a black baseball cap, a black and white bandana, a black jacket and black gloves. A.R. said the robber handed S.M. a bag. S.M. placed money from her cash drawer into the bag. A.R. stated S.M. then handed the bag to I.P. who placed money into the bag. A.R. advised I.P. then handed the bag to her. A.R. advised she placed money into the bag from her top teller drawer, including bait money consisting of ten \$20.00 bills that were banded together. A.R. stated the robber took the bag and left the bank.

9. Milwaukee Police Detective Ronald Linzmeyer reported that he interviewed a citizen eyewitness M.W. M.W. was a customer inside the M&I Bank at the time of this robbery. M.W. was completing a transaction when he heard a commotion. M.W. saw the robber standing at the bank teller counter. The robber was yelling, "Put your hands in the air." M.W. saw the robber had a gun in his hand and was waving the gun over his (robber's) head. M.W. watched the robber hand a bag over to the tellers of the bank. M.W. watched as the robber made his way to each teller. The tellers each placed money into a bag. After getting the money the robber left the bank.

10. An audit conducted by M&I Bank personnel revealed that the bank suffered a loss of \$9,348.00, as a result of the robbery.

11. Milwaukee Police Detective Linzmeyer also interviewed a citizen eyewitness, J.J. J.J. stated that he was parked in his work truck across the street from the M&I Bank. J.J. saw an individual wearing a knit hat and a mask run across the street in front of his truck. J.J. saw the individual had his right hand inside of a blue, nylon duffel bag, with gray trim. J.J. realized the bank was just robbed. J.J. proceeded to follow the robber in his truck. J.J. watched the suspect run south on S. 4<sup>th</sup> Street from National Avenue. The robber continued running south on S. 4<sup>th</sup> Street, until the robber reached the northeast corner of S. 4<sup>th</sup> Street and W. Walker. At this time, the robber pulled the mask from his face. The robber then began walking east on W. Walker. J.J. then lost sight of the robber, however J.J. saw a white, Toyota, Camry travel east on W. Walker from S. 4<sup>th</sup> Street, turn abruptly into the alley between S. 3<sup>rd</sup> and S. 4<sup>th</sup> Streets. J.J. proceeded to follow the vehicle, as he believed the robber might be in the car. The car continued south on S. 3<sup>rd</sup> Street, where J.J. stopped for stop sign at the intersection of S. 3<sup>rd</sup> Street and W. Mineral Street. J.J. observed the vehicle emerge from the alley. The vehicle continued east on W. Mineral Street and drove past the front of J.J.'s truck. J.J. saw the driver. The driver was no longer wearing a mask or hat, but his complexion and jacket were consistent with that of the robber. J.J. described the individual as a Hispanic male, with long, bushy, black hair pulled back into a pony tail, wearing a dark, blue jacket. J.J.



previously observed the robber wearing the dark blue jacket, as well as a black knit hat, a blue and white bandana, and carrying a black duffle bag. J.J. turned and followed the vehicle and obtained the license plate from the rear of the vehicle, which was Wisconsin plate 140NNT. J.J. followed the vehicle to S. 2<sup>nd</sup> Street and then turned and went back to the bank.

12. Milwaukee Police officers checked the vehicle registration of Wisconsin license plate 140NNT. The vehicle registration came back to a 1991, Toyota, Camry, four door sedan, white in color. The owner was listed as Marta Munoz, located at 4220 S. Vermont Ct. #11, Saint Francis, Wisconsin, 53235.

13. Milwaukee Police officers then went to 4220 S. Vermont Ct., #11, Saint Francis, Wisconsin. Milwaukee Police officers located Jose Barrientos. Barrientos stated that the officers that the white, Toyota, Camry, bearing Wisconsin plate 140NNT belonged to his girlfriend, Marta Munoz. Barrientos stated that neither he nor Munoz drove the Camry that day. Barrientos stated that the only other person who could drive the Camry was Munoz's son, Joseph Santiago. While police were talking with Barrientos, Joseph Santiago (h/m dob: 8/24/1988) showed up at the residence. Joseph Santiago matched the description of the bank robber. Joseph Santiago was taken into custody by the Milwaukee Police officers. A search incident to arrest of Joseph Santiago revealed ten crisp new one-hundred dollar bills in Joseph Santiago's left rear pants pocket. In Santiago's left front pants pocket was a Toyota car key.

14. A canvas was conducted by Milwaukee Police officers in the area where Joseph Santiago was located. Milwaukee Police came into contact with citizen witness C.C., who resides at 4220 S. Vermont Ct., #18, Saint Francis, Wisconsin. Milwaukee Police Officer Matthew Schulz interviewed C.C. C.C. allowed Officer Schulz into her apartment. C.C. stated that a few minutes before the police arrived, her boyfriend's friend, Joseph Santiago, came to her apartment. C.C. was shown a booking photo of Joseph Santiago. C.C. stated that was Joseph Santiago, who came to her apartment. C.C. stated that Santiago asked if he could hang out at her apartment. Joseph Santiago left for a minute but returned carrying a black mesh duffel bag. C.C. observed Joseph Santiago take a black handgun and either a black and white or blue and white bandana from the bag. C.C. saw Santiago dump a lot of paper money onto the floor. Joseph Santiago began separating the money. Santiago told C.C. he was leaving the money underneath the couch.

15. C.C. gave Milwaukee Police Officer Matthew Schulz consent to search her apartment. During the search, Officer Schulz located a plastic bag with \$8,248 in it, to include all the bait bills from the bank and the bank money wrappers, a black bandana, a black baseball cap, a pair of black knit gloves, a black nylon mesh carrier and a small semi auto handgun.

16. Based on the information provided in this affidavit, I submit that there is probable cause to believe that Joseph Santiago robbed the M&I Bank, located at 414 W. National

Avenue, Milwaukee, Wisconsin, on December 14, 2009, that the deposits of which are insured by the FDIC.